To: Federal Aviation Administration
Office of the Chief Counsel
Attn: Rules Docket (AGC-200) Docket No. FAA-2000-7952 (28293)
Room 915G
800 Independence Avenue, SW
Washington DC, 20591

From: American Trans Air (AMTR)

Date: November 13, 2000

Subject: Docket FAA-2000-7952 (28293) Information Collection Comments for SDR Program

The FAA requested comments to four questions on the information collection requirements of the Final Rule for Service Difficulty Reports (SDR). The comments are in regard to the FAA seeking an OMB control number for the new SDR process. The final rule, NPRM comments, and the OMB comment request were published in the Federal Register dated Sept 15, 2000. Below are the four questions with our comments.

(i) Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.

AMTR Comments: Airlines have a vested interest in safe and efficient operation of their aircraft. We are in support of the FAA's role in the industry of rule enforcement and oversight in the public's interest. Woven in the response to each of these four issues open for comment is the concern that the goals of this revision are not being met. The current reporting system lacks some basic information standards. The new rule attempts to fix this by spelling out what data is needed for each event. The new rule puts in place electronic reporting in a manner that operators should be able to comply with. The main problem with this information having any practical utility is the FAA and operators will be overwhelmed with data collection due to the ambiguity and perhaps unintended widening of the scope of reportable items. For example, new FAR 121.704 deals with Structural defects. This rule will require reporting **all** discrepancies that require some type of repair, rework, or replacement. Current 121.703 required reporting only items requiring major repair, and cracks, dents and corrosion beyond manufacture or FAA limits. The current rule is interpreted to mean items not requiring major repair or replacement are not reported. This one change will cause a fifty fold increase in structural reportable items with minimal benefit to the industry. MX programs are designed for early detection and repair of the aircraft. Items discovered and repaired before requiring major repair or replacement are an indicator of a good MX program. Collecting data on items that require repair that are not structurally significant is of limited benefit. A similar increase in reportable items is anticipated by requiring all autopilot, autothrottle, or flight control system discrepancies to be reported. The intent had been to report only uncommanded movements.

(ii) Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used.

AMTR Comments: We believe the FAA substantially underestimated the burden of this change. The cost and benefits analysis was based off of at best incomplete data and a poor understanding of the impact of the rule change on the expansion of reportable items. AMTR submitted in excess of 1100 Mechanical Reliability Reports (MRR, current term for 121.703 reportable items) over the past five years. Of those 1100 items less than 300 are in the FAA database. This means about 25% of the items we report are in the database. If this backlog is consistent with other carriers all assumptions are off by 400%. We have completed sampling of our MX data to determine the new rule impact and we estimate our reportable items will increase from 230 per year to 18,000. We do not have an answer from the FAA on why the reports we

have submitted are not being kept current in their database. I suspect the new electronic method would help keep them current. The new reporting requirements will add an average of 15 minutes to the time required to process each item. We anticipate having to add 3 full time employees to comply with the new requirements.

All assumptions made on the impact of this regulation come from the only guidance/interpretation available to us which is the rule itself and the FAA responses to the NPRM. There is no Advisory Circular or FAA Inspector Guidance available on this rule at this time.

(iii) Enhance the quality, utility, and clarity of the information to be collected.

AMTR Comments: Several of the changes put forth in the rule have great potential for enhancing quality, utility and clarity of the information collected. The expansion of the reportable items will dilute the database to the point where the shear volume of insignificant items will render the database unusable. According to the SDR Internet Site, AFS-620 is currently limiting the number of SDR's that can be retrieved electronically to 500 per query. If a larger sample is required we will have to make arrangements with AFS-620 to get the data. If the database is diluted large samples will be the standard.

We would prefer this report sticking with the industry standard ATA Spec 100 codes instead of using JASC. ATA codes are an everyday part of everything we do in MX from discrepancy reporting to Maintenance Manual and Parts Catalog indexing to in-house part numbering. We will not be able to switch our systems over to JASC. This will cause us to use 2 numbering schemes.

(iv) Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated electronic, mechanical or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

AMTR Comments: We are pleased with the concept of electronic reporting. We are disappointed that this rule change does nothing to eliminate dual reporting requirements mandated by programs such as CPCP and SID. The financial justification of this rule also failed to take into consideration the resources it will take operators to re-tool information systems to make the reports possible. We already had an electronic version for the old rule. The changes are so large that we are forced to build a new program from scratch.

In summary, we support most of the original intent of this rule. The rule in its current form is letting us all down. We request putting the implementation of this rule on hold. The preferred solution would be to meet with interested industry representatives to refine the wording of the rule. Prior to implementation, publish an advisory circular and/or Inspector Bulletins on the subject.

Sincerely,

Randy E. Marlar
Vice President Maintenance & Engineering